

# EXHIBIT 4

This Transcript Contains Confidential Material

Page 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: TERRORIST ATTACKS        ) 03-MDL-1570 (GBD) (SN)  
ON SEPTEMBER 11, 2001         )  
                                      )

— — —  
Tuesday, July 20, 2021

— — —  
THIS TRANSCRIPT CONTAINS  
CONFIDENTIAL MATERIAL  
— — —

Remote video-recorded deposition of JONATHAN BENTHALL, held at the location of the witness, commencing at 12:03 p.m., on the above date, before Debra A. Dibble, Certified Court Reporter, Registered Diplomate Reporter, Certified Realtime Captioner, Certified Realtime Reporter and Notary Public.

— — —  
  
GOLKOW LITIGATION SERVICES  
877.370.DEPS | fax 917.591.5672  
deps@golkow.com

## This Transcript Contains Confidential Material

Page 2	Page 4
<p>1 REMOTE APPEARANCES:</p> <p>2</p> <p>3 LAW FIRM OF OMAR T. MOHAMMEDI, LLC</p> <p>4 BY: JILL L. MANDELL, ESQUIRE</p> <p>5 jmandell@otmlaw.com</p> <p>6 Woolworth Building</p> <p>7 233 Broadway, Suite 820</p> <p>8 New York, New York 10279</p> <p>9 (212) 725-3846</p> <p>10 Counsel for World Assembly of Muslim Youth</p> <p>11</p> <p>12 KREINDLER &amp; KREINDLER LLP</p> <p>13 BY: ANDREW J. MALONEY, III, ESQUIRE</p> <p>14 amaloney@kreindler.com</p> <p>15 485 Lexington Avenue, 28th Floor</p> <p>16 New York, New York 10017</p> <p>17 (212) 687-8181</p> <p>18 Counsel for Plaintiffs' Executive</p> <p>19 Committee and the Ashton plaintiffs</p> <p>20</p> <p>21 COZEN O'CONNOR P.C.</p> <p>22 BY: SEAN P. CARTER, ESQUIRE</p> <p>23 scarter1@cozen.com</p> <p>24 J. SCOTT TARBUTTON, ESQUIRE</p> <p>25 starbutton@cozen.com</p> <p>One Liberty Place</p> <p>1650 Market Street</p> <p>Philadelphia, Pennsylvania 19103</p> <p>(800) 523-2900</p> <p>Counsel for Plaintiffs' Executive</p> <p>Committee and the Federal Insurance</p> <p>plaintiffs</p> <p>ANDERSON KILL</p> <p>BY: BRUCE STRONG, ESQUIRE</p> <p>bstrong.com</p> <p>(Attending telephonically)</p> <p>1760 Market Street</p> <p>Suite 600</p> <p>Philadelphia, PA 19103</p> <p>(267) 216-2711</p> <p>Counsel for Plaintiffs' Executive Committee</p>	<p>1 REMOTE APPEARANCES:</p> <p>2</p> <p>3 JONES DAY</p> <p>4 BY: STEVE COTTREAU, ESQUIRE</p> <p>5 scottreau@jonesday.com</p> <p>6 ERIC SNYDER, ESQUIRE</p> <p>7 csnyder@jonesday.com</p> <p>8 ABIGAIL BOSCH, ESQUIRE</p> <p>9 abosch@jonesday.com</p> <p>10 51 Louisiana Avenue, N.W.</p> <p>11 Washington, D.C. 20001</p> <p>12 (202) 879-3939</p> <p>13 Counsel for Dubai Islamic Bank</p> <p>14</p> <p>15 SALERNO &amp; ROTHSTEIN</p> <p>16 BY: PETER C. SALERNO, ESQUIRE</p> <p>17 peter.salerno.law@gmail.com</p> <p>18 AMY ROTHSTEIN, ESQUIRE</p> <p>19 amyrothsteinlaw@gmail.com</p> <p>20 P.O. Box 456</p> <p>21 Pine Plains, New York 12567</p> <p>22 (518) 771-3050</p> <p>23 Counsel for Yassin Kadi</p> <p>24</p> <p>25 CARTER-RUCK</p> <p>BY: GUY MARTIN, ESQUIRE</p> <p>guy.martin@carter-ruck.com</p> <p>HELENA SHIPMAN, ESQUIRE</p> <p>helena.shipman@carter-ruck.com</p> <p>The Bureau</p> <p>90 Fetter Lane</p> <p>London, England EC4A 1EN</p> <p>+44 (0)20 7358 5005</p> <p>Counsel for Yassin Abdullah Kadi</p> <p>ALSO PRESENT:</p> <p>JOHN FAWCETT</p> <p>KREINDLER &amp; KREINDLER</p> <p>NOUR SOUBANI, PARALEGAL</p> <p>LEWIS BAACH KAUFMAN MIDDLEMISS PLLC</p>
Page 3	Page 5
<p>1 REMOTE APPEARANCES:</p> <p>2 BERNABEI &amp; KABAT PLLC</p> <p>3 BY: ALAN KABAT, ESQUIRE</p> <p>4 kabat@bernabeipllc.com</p> <p>5 1400 16th Street NW</p> <p>6 Suite 500</p> <p>7 Washington DC 20036</p> <p>8 (202) 745-1942</p> <p>9 Counsel for Dr. Abdullah al Turki,</p> <p>10 Dr. Abdullah Al Obais, Dr. Abdullah</p> <p>11 Naseef, and Dr. Adnan Basha</p> <p>12</p> <p>13 MOTLEY RICE LLC</p> <p>14 BY: ROBERT T. HAEFELE, ESQUIRE</p> <p>15 rhaele@motleyrice.com</p> <p>16 JODI FLOWERS, ESQUIRE</p> <p>17 jflowers@motleyrice.com</p> <p>18 28 Bridgeside Blvd.</p> <p>19 Mt. Pleasant, South Carolina 29464</p> <p>20 (843) 216-9184</p> <p>21 Counsel for Plaintiffs' Executive</p> <p>22 Committee and Brunett plaintiffs</p> <p>23</p> <p>24 LEWIS BAACH KAUFMAN MIDDLEMISS PLLC</p> <p>25 BY: WALEED NASSAR, ESQUIRE</p> <p>waleed.nassar@lbkmlaw.com</p> <p>AISHA E.R. BEMBRY, ESQUIRE</p> <p>aisha.bembry@lbkmlaw.com</p> <p>1101 New York Avenue, N.W.</p> <p>Suite 1000</p> <p>Washington, D.C. 20005</p> <p>(202) 833-8900</p> <p>Counsel for the Muslim World League</p> <p>and the International Islamic Relief</p> <p>Organization.</p>	<p>1 TRIAL TECHNICIAN:</p> <p>2 DIANNE INT-HOUT</p> <p>3 GOLKOW LITIGATION SERVICES</p> <p>4</p> <p>5 VIDEOGRAPHER:</p> <p>6 DEVYN MULHOLLAND</p> <p>7 GOLKOW LITIGATION SERVICES</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

## This Transcript Contains Confidential Material

Page 6			Page 8		
1	INDEX		1	Exhibit 958 The Charitable Crescent	259
2			2		
3	APPEARANCES	2	3		
4	PROCEEDINGS	9	4		
5			5	REFERENCED EXHIBITS	
6	EXAMINATION OF JONATHAN BENTHALL:		6	NUMBER	PAGE
7	BY MR. MALONEY	10	7	Exhibit 159	216
8	BY MR. CARTER	208	8	Exhibit 853	255
9	BY MR. MALONEY	287	9		
10	BY MR. CARTER	289	10		
11			11		
12	CERTIFICATE	292	12		
13	ERRATA	294	13		
14	ACKNOWLEDGMENT OF DEPONENT	295	14		
15	LAWYER'S NOTES	296	15		
16			16		
17			17		
18			18		
19			19		
20			20		
21			21		
22			22		
23			23		
24			24		
25			25		

  

Page 7			Page 9		
1	DEPOSITION EXHIBITS		1	-----	
2	NUMBER DESCRIPTION PAGE		2	PROCEEDINGS	
3	Exhibit 947 Notice of Oral Deposition of	22	3	July 20, 2021, 12:03 p.m. BST	
4	Jonathan Benthall		4	-----	
5	Exhibit 948 Jonathan Benthall curriculum vitae	23	5	THE VIDEOGRAPHER: We are now	
6			6	on the record. My name is Devyn	
7	Exhibit 949 Jonathan Benthall IIRO and MWL invoices	95	7	Mulholland. I'm a videographer with	
8			8	Golkow Litigation Services. Today's	
9	Exhibit 950 Jonathan Benthall Kadi invoices	100	9	date is July 20th, 2021. The time is	
10	Exhibit 951 Expert report of Jonathan Benthall on Behalf of Yassin Abdullah Kadi	107	10	12:04 p.m. This remote video	
11			11	deposition is being held in the matter	
12			12	of Terrorist Attacks on September 11,	
13	Exhibit 952 Documents Considered by Expert	121	13	2001, MDL No. 1570. The deponent is	
14	Exhibit 953 E-mail with attached Supplemental List of Documents Considered by Jonathan Benthall - Expert Report for Yassin Abdullah Kadi	124	14	Jonathan Benthall.	
15			15	All parties to this deposition	
16			16	are appearing remotely and have agreed	
17			17	to the witness being sworn in	
18			18	remotely.	
19	Exhibit 954 Linde v Arab Bank opinion	203	19	Due to the nature of remote	
20	Exhibit 955 Expert Report of Jonathan Benthall	209	20	reporting, please pause briefly before	
21			21	speaking to ensure all parties are	
22	Exhibit 956 Exhibit B, Documents Considered by Expert	210	22	heard completely.	
23			23	Counsels' appearances will be	
24	Exhibit 957 The Rise and Decline of Saudi Overseas Humanitarian Charities	243	24	noted on the stenographic record. The	
25			25	court reporter is Debbie Dibble and	

## This Transcript Contains Confidential Material

<p style="text-align: right;">Page 10</p> <p>1 will now swear in the witness.  2 -----  3 JONATHAN BENTHALL,  4 having been duly sworn,  5 testified as follows:  6 -----  7 EXAMINATION  8 -----  9 BY MR. MALONEY:  10 Q. Good afternoon, Mr. Benthall.  11 Morning for us on the East Coast of the U.S.  12 My name is Andrew Maloney. I'm  13 an attorney with the law firm of Kreindler &amp;  14 Kreindler in New York.  15 And I represent, along with  16 several other attorneys, the plaintiffs in a  17 legal action in the United States,  18 representing the victims of the  19 September 11th attacks and survivors,  20 estates, and also some commercial interests  21 collectively, the plaintiffs' team.  22 You understand that?  23 A. I do.  24 Q. If you could keep your voice up  25 a little bit. I think you're -- it's a</p>	<p style="text-align: right;">Page 12</p> <p>1 being retained on their behalf, but if that's  2 the legal position, then that --  3 Q. I'm really having trouble  4 hearing you.  5 Is there a way to enhance your  6 microphone?  7 MR. NASSAR: Give us one  8 second.  9 THE VIDEOGRAPHER: Counsel, do  10 you want to go off the record?  11 A. Is that better now?  12 Q. (BY MR. MALONEY) It's slightly  13 better. Perhaps maybe just keep your voice  14 up a little bit.  15 A. I'll try, yes.  16 Q. Okay. Have you ever met any of  17 those gentlemen?  18 A. Mr. Basha, Dr. Basha, I've met.  19 Q. And when did you meet him for  20 the first time?  21 A. I met him first in Istanbul in,  22 I think it was 2005 at a meeting of the  23 Montreux Initiative -- convened by the  24 Montreux Initiative, which was sponsored by  25 the Swiss government foreign office,</p>
<p style="text-align: right;">Page 11</p> <p>1 little bit of a --  2 A. Can I move this --  3 Q. Yeah, that would be great.  4 Thank you.  5 And do you understand you have  6 been retained by the Muslim World League  7 to -- who is one of the defendants in that  8 lawsuit?  9 A. Among others, yes.  10 Q. I'm sorry?  11 A. Among others.  12 Q. And you also have been retained  13 to provide an opinion for the Islamic --  14 International Islamic Relief Organization  15 also known as the IIRO?  16 A. Correct.  17 Q. And they're also a defendant in  18 the lawsuit; correct?  19 A. Yes.  20 Q. And some of the persons  21 affiliated with those entities, Dr. Naseef,  22 Dr. Al-Obais, Dr. Al-Turki and Basha? Are  23 you familiar with those gentlemen?  24 A. I am familiar with the names.  25 I haven't -- I didn't realize I was actually</p>	<p style="text-align: right;">Page 13</p> <p>1 political division 4.  2 Q. I'm going to ask you a few  3 questions about that Swiss project, but  4 before -- we'll get to that in a few minutes.  5 Have you met Dr. Basha since  6 2005?  7 A. Yes, I believe I met him in  8 Doha in probably the following year, but very  9 briefly. I didn't have a long conversation  10 with him. Doha was part of the same Montreux  11 Initiative meeting in Doha.  12 Q. And was that the last time you  13 met him?  14 A. Yes.  15 Q. Just to be clear, my questions  16 would also encompass phone calls or e-mail or  17 text communications with any of those  18 gentlemen.  19 Have you had any communications  20 with them?  21 A. Yes, I've had e-mail  22 communications with Dr. Basha in the years  23 following, because I asked -- tried to  24 ascertain more information about IIRRO, their  25 activities and operations, and I got on their</p>